



**PATENT**

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

**Title:** "System and Method for Associating a Destination Document  
to a Source Document During a Save Process"  
**Applicant:** Reiner Kraft  
**Attorney Docket No.:** ARC920010034US1

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<b>Serial No.:</b> 09/825,210	<b>Examiner:</b> Nathan Hillery
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Board of Patent Appeals and Interferences  
Commissioner for Patents  
P.O.Box 1450  
Alexandria, VA 22313-1450

**APPEAL BRIEF**

Dear Sir:

This appeal brief is submitted under 35 U.S.C. §134. This appeal is further  
to Appellants' Notice of Appeal that is attached hereto.

**Table of Contents**

<u>Section</u>	<u>Title</u>	<u>Page</u>
(1)	Real Party in Interest	2
(2)	Related Appeals and Interferences	2
(3)	Status of Claims	2
(4)	Status of Amendments	2
(5)	Summary of Claimed Subject Matter	3
(6)	Grounds of Rejection to be Reviewed on Appeal	8
(7)	Arguments	8
App. A	Claims Appendix	21

**(1) Real Party in Interest**

The real party in interest is International Business Machines Corporation.

**(2) Related Appeals and Interferences**

No other appeals or interferences exist that relate to the present application or appeal.

**(3) Status of Claims**

Claims 1, 5-11, and 15-26 are pending and remain in the application. In the Final Office Action of March 17, 2005, and further as confirmed in the advisory action of June 3, 2005:

- Claims 20 - 26 were rejected under 35 U.S.C. 101 on the ground that the claimed invention is directed to non-statutory subject matter.
- Claim 20 is objected to on the ground that it contains an informality.
- Claims 1, 5-11, and 15-26 have been indicated to be finally rejected as being obvious in view of Farber et al. (US 6654807 B2) and Heninger et al. (US 6470349 B1).

**(4) Status of Amendments**

The amendment filed on May 12, 2005 was not entered by the Examiner. Appellant respectfully requests that the amendment be entered based on the grounds presented in the "Arguments" section below.

## **(5) Summary of Claimed Subject Matter**

The present invention relates in general to a computer software product that creates an Internet search and a retrievable activity history for a user in an Internet search session,

### 5.1. Problems addressed by the present invention

Prior to presenting substantive arguments in favor of the allowability of the claims on file, it might be desirable to summarize the present invention in view of the problem it addresses. With conventional web browsers, users are able to save the target document of hyperlinks. This is accomplished by using a pointing device such as a mouse to select the hyperlink (typically using the right mouse button) then choosing the "save target as" entry to copy and save the document target to a desired location. (Page 2, lines 21 - 27).

Once a web document is saved, the Internet (or hyperlink) context from a source document to a destination document, passing by one or more intervening target documents, is lost. Consequently, the user will not be able to return from the destination document to the source document, nor would it be possible for the user to return to the download location of the document, since this information is lost during the save process. (Page 2, line 28 - page 3, line 2).

## 5.2. Summary of the subject matter of independent claim 1

Prior to describing the subject matter of independent claim 1, it might be useful to present the definitions, in order to help in the understanding of certain terms in claim 1:

Destination document: A final document or web page which is comprised of a target document that is bundled with contextual data about the source document. *(Page 6, lines 10 - 11).*

Contextual data include, for example, the input parameters 172, the destination URL 176, and the URL 174 of the source document 50. *(Page 10, lines 11 - 13).* The context of the source document may include, for example, one or more of the following parameters:

- The location or address, such as the URL, of the source document;
- the path, such as pages examined to navigate from the source document to the target document; and
- the input parameters required to generate the target document, such as the search query inputted by the user. *(Page 3, line 29 - page 4, line 5).*

Source document: An initial document or web page that points, whether directly or indirectly, to a target document and/or to a destination document. *(Page 7, lines 7 - 8).*

Target document: A special intermediate document or web page that points directly to a destination document. *(Page 7, lines 10 - 11).*

The present invention is exemplified by independent claim 1, according to which a destination document is associated to a source document during a save operation. Reference is made to system 10 (FIGS. 1 and 2) and to method 300 (FIG. 3). At step 340 of method 300 (FIG. 3), the save command prompts the system 10 and more specifically the document storage manager 150 to create the destination document 90 by bundling the target document 60 with the context data of the source document 50. (Page 12, lines 26 - 29).

More specifically, at step 305 of method 300 (FIG. 3), the user inputs query parameters 172 (FIG. 2) using the browser 140. At step 310, the document storage manager 150 sends the search query to the service provider (or server) 100. Whereupon, at step 320, the service provider 100 returns the search results to the user's web browser 140 as the source document, and establishes a connection with the system 10. The user reviews the search results at step 330, and, at step 335, the user navigates the Internet using the hyperlinks 70, 72, 74, 76 in the source document 50 and the intermediate document or documents 55 (FIG. 1). (Page 12, lines 12 - 16).

The user continues his or her navigation until he or she detects the desired target document 60 (FIG. 1). At which point, the user identifies such target document 60, issues a save command, and enters the destination address (URL) 176 of the destination documents repository 170 where he or she desires to store the destination document 90 (FIG. 1). At step 340, the save command prompts the system 10 and more specifically the

document storage manager 150 to create the destination document 90 by bundling the target document 60 with the context data of the source document 50. *(Page 12, lines 18 - 29; and page 1, lines 10 - 12).*

As explained in the specification at page 13, lines 12 -14, the target document "White Paper" is bundled with context attributes and saved as a destination document that resides on the selected storage medium as a pdf document. Accordingly, users will be able to return to the source document, and optionally to use applications for automatically synchronizing a destination document to the target document to reflect changes in the target document. *(Page 3, lines 25 - 27; and page 4, lines 20 - 23).*

In other terms, the document association method of the present invention satisfies the need of conventional systems by **bundling** (or associating) **and synchronizing** a target document (i.e., a web page) and the context of a source document as metadata to intervening target documents during a save process. Accordingly, users will be able to return to the source document, and optionally to use applications for automatically synchronizing a destination document to the target document. *(Page 3, lines 22 - 27).*

When a user wishes to access the source document, the system uses the saved context metadata to link the user to the source document. The system is also capable of synchronizing the target document(s) to the destination document. When coupled with a synchronization application, the system allows the user to update the destination document to reflect

changes in the target document(s), allowing a convenient mechanism for updating saved documents. The synchronization application performs a comparison of the destination document with the target document to detect changes and to automatically update the destination document. If the target document were deleted from its original location or relocated, the destination document is marked as orphaned. (Page 4, lines 9 - 27).

### 5.3. Summary of the subject matter of independent claim 11

While claim 1 exemplifies the present invention in connection with a method for associating a destination document to a source document during a save operation, claim 11 corresponds to claim 1, and exemplifies the present invention in connection with a system for associating a destination document to a source document during a save operation.

### 5.4. Summary of the subject matter of independent claim 20

While claim 1 exemplifies the present invention in connection with a method for associating a destination document to a source document during a save operation, claim 20 corresponds to claim 1, and exemplifies the present invention in connection with a computer program product having a plurality of instruction codes stored on a computer-readable medium, for associating a destination document to a source document during a save operation.

**(6) Grounds of Rejection to be Reviewed on Appeal**

Appellant respectfully traverses the following grounds of rejection and request that they be reviewed on appeal:

6.1. First Ground of Rejection

- Claims 20 - 26 stand rejected under 35 U.S.C. 101 on the ground that the claimed invention is directed to non-statutory subject matter.

6.2. Second Ground of Rejection

- Claim 20 is objected to on the ground that it contains an informality.

6.3. Third Ground of Rejection

- Claims 1, 5-11, and 15-26 stand rejected as being obvious in view of Farber et al. (US 6654807 B2) and Heninger et al. (US 6470349 B1).

**(7) Arguments**

**7.A. Argument Responding to the First Ground of Rejection**

Claims 20 - 26 stand rejected under 35 U.S.C. 101 on the ground that the claimed invention is directed to a non-statutory subject matter.

In the Amendment After Final that was filed on May 12, 2005, Appellant amended claim 20, as reproduced below along with the amendment annotations, in order to clarify that the "computer program product"



includes instruction codes that are stored on a computer-readable medium.

"20. (As amended) A computer program product having a plurality of instruction codes stored on a computer-readable medium, for associating a destination document to a source document during a save operation, comprising:

- a first set of instruction codes for defining contextual metadata of the source document, wherein the contextual metadata includes a location of the source document;

- a second set of instruction codes for bundling a target document identified by a content and contextual data, with the contextual metadata of the source document, as attributes of the target document;

- a third set of instruction codes for saving a bundled target document as the destination document;

- wherein the second set of instruction codes bundles the target document by merging the contextual metadata of the source document and the contextual data of the target document as integral attributes of the target document; and

- a fourth set of instruction codes for automatically synchronizing the destination document to the target document, to reflect changes in the target document."

In response, the Advisory Action rejects this amendment to claim 20 based on the following grounds:

"The Office must first reconsider whether or not the claim(s) is/are statutory based on the newly amended language."

"Further, this amendment may alter the interpretation of the claimed language in regards to the other rejection(s) made in the final office action, e.g. 35 U.S.C. 103(a); thus requiring further search and/or consideration."

Appellant respectfully traverses both of these grounds, and submits that Appellant has already argued in his first Amendment filed on September 27, 2004, that: "Independent claims 11 and 20 are also allowable for

reciting generally similar elements and limitations to those of claim 1." In other terms, Appellant clearly intended for claim 20 to have similar limitations as in claim 1. Consequently, Appellant did not intend to add new limitations to claim 1, and thus no new matter was added that would otherwise necessitate a new search.

In addition, in rejecting claim 20 in the final office action, the Examiner indicates that: "6. Further, to expedite a **complete examination** of the instant application **the claims rejected under 35 U.S.C. 101 (nonstatutory)** above are further rejected as set forth below in anticipation of applicant amending these claims to place them within the four statutory categories of invention." Emphasis added.

In other terms, **the Examiner already conducted a complete examination** of claims 20 - 26 with the anticipation that claims 20-26 will be amended in compliance with 35 USC 101 (which is what the Appellant intended too), and thus no further examination, analysis, or review is necessary or needed on the part of the Examiner. Therefore, the amendment to claim 20 should have been considered and entered.

Furthermore, in the Final Office Action, the Examiner indicates that: "5. Claims 20 - 26 are rejected under 35 U.S.C. 101 because the claimed invention is directed to non-statutory subject matter. Claims 20 - 26 recite non-functional descriptive material, specifically a computer program product not tangibly embodied to a computer. Consequently, the claimed invention does not require the technical or useful arts and, thus, fails to define patentable subject matter. The rejection to these claims may be

overcome if an inference to some form of hardware is claimed." Emphasis added.

In other terms, the Examiner is stating that claims 20 - 26 are rejected for not including a functional language directed to a computer program product that is tangibly embodied in a computer. In satisfaction of the Examiner's rejection, Appellant amended claim 20 to recite a plurality of instruction codes (e.g., a first set of instruction codes, a second set of instruction codes, etc.). However, Appellant inadvertently omitted to add the language that explicitly explain that these instruction codes are stored on a computer-readable medium (as subsequently proposed by the amendment).

It should have been amply clear to a person of ordinary skill that when claiming instruction codes for a computer program product, these instruction codes will need to be stored on a medium that is readable by a computer. In other terms, it would not be consistent with the claim language or the invention as a whole, that the instruction codes for a computer program product be implemented by means of a user's thought process.

As a result, claim 20, as amended, satisfies the requirement of 35 USC 101. The amendment to claim 20 does not require additional search on the part of the Examiner and should have been entered.

Claim 20 in Appendix A incorporates the limitation that was not entered by the Examiner. Appellant respectfully requests the consideration of claim 20 as presented in Appendix A.

**7.B. Argument Responding to the Second Ground of Rejection**

In the Final Office Action, claim 20 was objected to on the ground that it contains an informality, qualifying it as containing an awkward language. However, the Examiner did not specify the ground of objection; an awkward language is not a proper legal ground of objection. In the Amendment After Final, Appellant amended claim 20 to clarify the informality objected to by the Examiner. Nonetheless, the Advisory action, still objecting to claim 20, did not specify if the amendment to claim 20 satisfies the Examiner's objection. The Examiner seems to have solely focused on the rejection under 35 USC 101, as discussed above, but overlooked the objection and the amendment to claim 20 in satisfaction of 35 USC 112, second paragraph.

Wherefore, Appellant respectfully requests that the amendment to claim 20 be entered.

## **7.C. Argument Responding to the Third Ground of Rejection**

### **7.C.1. The Rejection**

Claims 1, 5-11, and 15-26 stand rejected as being obvious in view of Farber et al. (US 6654807 B2), hereinafter referred to as "Farber", and Heninger et al. (US 6470349 B1), hereinafter referred to as "Heninger".

Appellant respectfully submits that neither one of the cited references discloses all the elements and limitations of the rejected claims (the invention as a whole). Consequently, the claims presently on file are not obvious in view of the cited references whether considered separately or in combination with each other. In support of this position, Appellant submits the following arguments:

### **7.C.2. Legal Standard of Obviousness**

The following legal authorities set the general legal standards in support of Appellant's position of non obviousness, with emphasis added for added clarity:

- MPEP 706.02(j), **"To establish a prima facie case of obviousness, three basic criteria must be met.** First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, **the prior art reference (or references when combined) must teach or suggest all the claim limitations.** The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on Appellant's disclosure. In re

Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991) ... The initial burden is on the examiner to provide some suggestion of the desirability of doing what the inventor has done. "To support the conclusion that the claimed invention is directed to obvious subject matter, either the references must expressly or impliedly suggest the claimed invention or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references." Ex parte Clapp, 227 USPQ 972, 973 (Bd. Pat. App. & Inter. 1985)."

- In determining the differences between the prior art and the claims, the question under 35 U.S.C. 103 is not whether the differences themselves would have been obvious, but whether the claimed invention as a whole would have been obvious. The prior art perceived a need for mechanisms to dampen resonance, whereas the inventor eliminated the need for dampening via the one-piece gapless support structure. "Because that insight was contrary to the understandings and expectations of the art, the structure effectuating it would not have been obvious to those skilled in the art." 713 F.2d at 785, 218 USPQ at 700 (citations omitted).
- MPEP §2143.03, "All Claim Limitations Must Be Taught or Suggested: To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). "All words in a claim must be considered in judging the patentability of that claim against the prior art." In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). If an independent claim is nonobvious under 35 U.S.C. 103, then any claim depending therefrom is nonobvious. In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988)."
- MPEP §2143.01, "The Prior Art Must Suggest The Desirability Of The Claimed Invention: There are three possible sources for a motivation to combine references: the nature of the problem to be solved, the teachings of the prior art, and the knowledge of persons of ordinary skill in the art." In re Rouffet, 149 F.3d 1350, 1357, 47 USPQ2d 1453, 1457-58 (Fed. Cir. 1998) (The combination of the references taught every element of the claimed invention, however without a motivation to combine, a rejection based on a prima facie case of obvious was held improper.). The level of skill in the art cannot be relied upon to provide

the suggestion to combine references. *Al-Site Corp. v. VSI Int'l Inc.*, 174 F.3d 1308, 50 USPQ2d 1161 (Fed. Cir. 1999).

- "**Obviousness cannot be established** by combining the teachings of the prior art to produce the claimed invention, **absent some teaching or suggestion** supporting the combination." *In re Fine*, 837 F.2d at 1075, 5 USPQ2d at 1598 (citing *ACS Hosp. Sys. v. Montefiore Hosp.*, 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984)). **What a reference teaches** and whether it teaches toward or **away from the claimed invention** are questions of fact. See *Raytheon Co. v. Roper Corp.*, 724 F.2d 951, 960-61, 220 USPQ 592, 599-600 (Fed. Cir. 1983), cert. denied, 469 U.S. 835, 83 L. Ed. 2d 69, 105 S. Ct. 127 (1984). "
- "When a rejection depends on a combination of prior art references, there must be **some teaching, suggestion, or motivation** to combine the references. See *In re Geiger*, 815 F.2d 686, 688, 2 USPQ2d 1276, 1278 (Fed. Cir. 1987)." **Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation** to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. See MPEP 2143.01; *In re Kotzab*, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000); *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); and *In re Jones*, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).
- "With respect to core factual findings in a determination of patentability, however, the **Board cannot simply reach conclusions based on its own understanding or experience** -- or on its assessment of what would be basic knowledge or common sense. **Rather, the Board must point to some concrete evidence in the record** in support of these findings." See *In re Zurko*, 258 F.3d 1379 (Fed. Cir. 2001).
- "We have noted that **evidence of a suggestion, teaching, or motivation to combine** may flow from the prior art references themselves, the knowledge of one of ordinary skill in the art, or, in some cases, from the nature of the problem to be solved, see *Pro-Mold & Tool Co. v. Great Lakes Plastics, Inc.*, 75 F.3d 1568, 1573, 37 USPQ2d 1626, 1630 (Fed. Cir. 1996), *Para-Ordinance Mfg. v. SGS Imports Intern., Inc.*, 73 F.3d 1085, 1088, 37 USPQ2d 1237, 1240 (Fed. Cir. 1995), although "the suggestion more often comes from the teachings of the pertinent references," *Rouffet*, 149 F.3d at 1355, 47 USPQ2d at 1456. The range of sources

available, however, does not diminish the requirement for actual evidence. That is, **the showing must be clear and particular**. See, e.g., C.R. Bard, 157 F.3d at 1352, 48 USPQ2d at 1232. **Broad conclusory statements regarding the teaching of multiple references, standing alone, are not "evidence."** E.g., McElmurry v. Arkansas Power & Light Co., 995 F.2d 1576, 1578, 27 USPQ2d 1129, 1131 (Fed. Cir. 1993) ("Mere denials and conclusory statements, however, are not sufficient to establish a genuine issue of material fact."); In re Sichert, 566 F.2d 1154, 1164, 196 USPQ 209, 217 (CCPA 1977)." See In re Dembiczak, 175 F. 3d 994 (Fed. Cir. 1999).

- "To prevent the use of hindsight based on the invention to defeat patentability of the invention, **this court requires the examiner to show a motivation to combine the references** that create the case of obviousness. In other words, **the examiner must show reasons** that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would select the elements from the cited prior art references **for combination in the manner claimed**." See In re Rouffet, 149, F.3d 1350 (Fed. Cir. 1998).
- The mere fact that references can be combined or modified does not render the resultant combination obvious **unless the prior art also suggests the desirability of the combination**. In re Mills, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990). Although a prior art device "may be capable of being modified to run the way the apparatus is claimed, **there must be a suggestion or motivation in the reference** to do so." 916 F.2d at 682, 16 USPQ2d at 1432.). See also In re Fritch, 972 F.2d 1260, 23 USPQ2d 1780 (Fed. Cir. 1992) (flexible landscape edging device which is conformable to a ground surface of varying slope not suggested by combination of prior art references).
- If the **proposed modification would render the prior art invention being modified unsatisfactory** for its intended purpose, **then there is no suggestion or motivation** to make the proposed modification. In re Gordon, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984).

### **7.C.2. Application of the Obviousness Standard to the Present Invention**

The Examiner bases the rejection of claim 1, at least in part on the following grounds:

"Farber et al. do not explicitly teach ***bundling ... as attributes of the***



**target document or merging ... as integral attributes of the target document.** However, it would have been obvious to one of ordinary skill in the art at the time of the invention to be motivated to do so using the invention of Farber et al. because the skilled artisan would want to ensure that the resource and the modified resource identifier are appropriately matched so as to provide a better way of processing resource requests in a computer network (Column 3, lines 1 and 2) as further evidenced by Farber et al. teaching that ...the first match identifies the attributes for the resource, namely repeatable or local. If there is no match in the rule base, a default attribute is used ...(Column 8, lines 23 - 25).

Also, Farber et al. do not explicitly teach **synchronizing**. However, Heninger et al. do teach that in the case of caches, it is also useful to generate a source command to be placed in your target script referring back to the source script. This ensures that the target stays synchronized with the source (Column 16, lines 16 - 20), which provides for **automatically synchronizing the destination document to the target document**. It would have been obvious to one of ordinary skill in the art at the time of the invention to combine the invention of Farber et al. with that of Heninger et al. because such a combination would provide the users of Farber et al. with a server side scripting language and programming tool designed to simplify programming for web pages using databases or other dynamic information (Column 2, lines 49 - 52)."

Appellant agrees with the Examiner that Farber does not explicitly teach the following features that are recited in claim 1:

1. bundling ... as attributes of the target document;
2. merging ... as integral attributes of the target document; and
3. synchronization.

Based on the legal authorities above, neither Farber, Heninger et al., nor the combination thereof, describes essential elements of the present invention, and consequently claim 1 is not obvious in view of these references. In support of this position, Appellant respectfully submits that Farber expressly states that: "If the particular requested resource itself can

contain identifiers of other resources, then the resource may be rewritten (before being provided to the client). In particular, the resource is rewritten to replace at least some of the resource identifiers contained therein with modified resource identifiers designating a repeater instead of the origin server. As a consequence of this rewriting process, when the client requests other resources based on identifiers in the particular requested resource, the client will make those requests directly to the selected repeater, bypassing the reflector and origin server entirely." (Column 3, lines 39 - 49).

In other terms, the modified resource identifier in Farber no longer contains the original resource, which defeats the purpose of the present invention that specifically contains contextual data about the source document. In this respect, Farber seems to teach away from the present invention.

The Examiner argues that "it would have been obvious to one of ordinary skill in the art at the time of the invention to be motivated to do so using the invention of Farber et al. because the skilled artisan would want to ensure that the resource and the modified resource identifier are appropriately matched so as to provide a better way of processing resource requests in a computer network (Column 3, lines 1 and 2)." Emphasis added.

In response, Appellant respectfully submits that the generic reason relied upon by the Examiner, namely "to provide a better way of processing resource requests in a computer network," does not provide a sufficiently specific technical ground for rejecting claim 1. In fact, improving computer

processing resource requests is a very generic objective that is applicable to a vast majority of computer related designs.

Farber does not teach saving a web page along with specific attributes of the source document and the intervening target documents. In addition, since Farber deflects the quest to alternative sources, i.e., other than the original source document, indicates that Farber does not, in certain circumstances allow access to the source document.

The Examiner states that Farber et al. do not explicitly teach merging ... as integral attributes of the target document. In essence, the Examiner bases the rejection ground **on the same generic argument** discussed earlier, namely "to provide a better way of processing resource requests in a computer network". Appellant therefore incorporates by reference the arguments made earlier in overcoming this rejection ground, without having to repeat the same arguments.

The Examiner further states that: **Farber et al. do not explicitly teach "{automatically synchronizing the destination document to the target document. ... (Column 2, lines 49 – 52)."**

Appellant respectfully submits that the invention is not limited to the step of synchronizing in the abstract, but rather in combination with the remaining elements and features of claim 1. More specifically, the present invention recites automatically synchronizing the destination document to the target document, to reflect changes in the target document. **The synchronization step, in conjunction with the bundling step, enables the**

**present invention to track down the source document even if the target documents change.** This feature is not taught in the cited references, whether considered individually or in combination with each other, and none of the references suggests such combination. As a result, the two cited references cannot be properly combined.

Therefore, claim 1 and the claims dependent thereon are allowable, and such allowance is respectfully requested. In addition, with respect to the dependent claims, Appellant does not assert each individual feature independently in the abstract, but rather in combination with the elements and features of claim 1.

Independent claims 11 and 20 are also allowable for reciting generally similar elements and limitations to those of claim 1. As a result, claims 11 and 20 and the claims dependent thereon are allowable and such allowance is respectfully requested.

Respectfully submitted,

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**APPENDIX A**  
**CLAIMS ON APPEAL**

1. A method of associating a destination document to a source document during a save operation, comprising:

- defining contextual metadata of the source document, wherein the contextual metadata includes a location of the source document;
- identifying a target document by a content and contextual data;
- bundling the target document, and the contextual metadata of the source document as attributes of the target document;
- saving a bundled target document as the destination document;
- wherein bundling the target document comprises merging the contextual metadata of the source document and the contextual data of the target document as integral attributes of the target document; and
- automatically synchronizing the destination document to the target document, to reflect changes in the target document.

2 - 4. (Canceled)

5. The method of claim 1, wherein defining the contextual metadata of the source document includes defining the address of the source document.

6. The method of claim 5, wherein defining the address of the source document includes identifying a URL of the source document.

7. The method of claim 5, wherein defining the contextual metadata of

the source document further includes defining a navigation path from the source document to the target document.

8. The method of claim 5, wherein defining the contextual metadata of the source document further includes defining input parameters required to generate the target document.

9. The method of claim 8, wherein defining the input parameters includes defining an input search query.

10. The method of claim 5, wherein saving the bundled target document includes saving the destination document on a networked data repository.

11. A system for associating a destination document to a source document during a save operation, comprising:

- an application that defines contextual metadata of the source document, wherein the contextual metadata includes a location of the source document;

- a processor that bundles a target document identified by a content and contextual data, with the contextual metadata of the source document, as attributes of the target document;

- a repository for storing a bundled target document as the destination document;

- wherein the processor bundles the target document by merging the contextual metadata of the source document and the contextual data of the target document as integral attributes of the target document; and

an application that automatically synchronizes the destination document to the target document, to reflect changes in the target document.

12 - 14. (Canceled)

15. The system of claim 13, wherein the contextual metadata of the source document includes the address of the source document.

16. The system of claim 15, wherein the address of the source document includes a URL of the source document.

17. The system of claim 15, wherein the contextual metadata of the source document further includes a navigation path from the source document to the target document.

18. The system of claim 15, wherein the contextual metadata of the source document further includes input parameters required to generate the target document.

19. The system of claim 18, wherein the input parameters include an input search query.

20. A computer program product having a plurality of instruction codes stored on a computer-readable medium, for associating a destination document to a source document during a save operation, comprising:

a first set of instruction codes for defining contextual metadata of the source document, wherein the contextual metadata includes a location of the source document;

a second set of instruction codes for bundling a target document identified by a content and contextual data, with the contextual metadata of the source document, as attributes of the target document;

a third set of instruction codes for saving a bundled target document as the destination document;

wherein the second set of instruction codes bundles the target document by merging the contextual metadata of the source document and the contextual data of the target document as integral attributes of the target document; and

a fourth set of instruction codes for automatically synchronizing the destination document to the target document, to reflect changes in the target document.

21. The computer program product of claim 20, wherein defining the contextual metadata of the source document includes defining the address of the source document.

22. The computer program product of claim 21, wherein defining the address of the source document includes identifying a URL of the source document.



23. The computer program product of claim 21, wherein defining the contextual metadata of the source document further includes defining a navigation path from the source document to the target document.

24. The computer program product of claim 21, wherein defining the contextual metadata of the source document further includes defining input parameters required to generate the target document.

25. The computer program product of claim 24, wherein defining the input parameters includes defining an input search query.

26. The computer program product of claim 21, wherein saving the bundled target document includes saving the destination document on a networked data repository.